

# EXHIBIT F

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RUBY FREEMAN and WANDREA' MOSS

Plaintiffs,

-against-

RUDOLPH W. GIULIANI

Defendant.  
-----X

No. 24-cv-6563(LJL)

No. 24-mc-353(LJL)

Defendants' Amended Response to  
Plaintiffs' First Set of  
Interrogatories

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 33.3 of the Southern District of New York, Defendant Rudolph W. Giuliani submit the Amended Responses to Plaintiffs' First Set of Interrogatories.

AMENDED RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 3: Identify all Documents You intend to rely on to support your claim that You established a homestead at the Palm Beach Condo within the meaning of article X, section 4 of the Florida Constitution.

**AMENDED RESPONSE:** Defendant intends to rely on documents including but not limited to the following to support Defendant's claim that Defendant established a homestead at the Palm Beach Condo within the meaning of article X, section 4 of the Florida Constitution:

(a) Deed dated February 11, 2010 in the name of Rudolph W. Giuliani and Judith S. Giuliani for the real property located at and known as Condominium Unit 5D, 315 S. Lake Drive, Palm Beach, Florida (**Exhibit "1"**);

(b) Deed dated January 14, 2020 in the name of Rudolph W. Giuliani for

the real property located at and known as Condominium Unit 5D, 315 S. Lake Drive, Palm Beach, Florida **(Exhibit “2”)**;

(c) Exclusive Right to Sell – Cooperative Agreement between Rudolph W. Giuliani and Sotheby’s International Realty dated July 12, 2023 **(Exhibit “3”)**;

(d) Invoice #416642 from Corporate Transfer & Storage Inc. dated October 16, 2024 **(Exhibit “4”)**;

(e) Application for Homestead and Related Tax Exemption **(Exhibit “5”)**;

(f) Notice of Proposed Property Taxes and Proposed or Adopted Non-Ad Valorem Assessments **(Exhibit “6”)**;

(g) Real Estate Tax Bill from the Palm Beach County Tax Assessor / Collector **(Exhibit “7”)**;

(h) Declaration of Domicile filed in the Office of the Palm Beach County Clerk on July 15, 2024 **(Exhibit “8”)**;

(i) New York State Department of Taxation and Finance confirmation of no Star Credit **(Exhibit “9”)**;

(i) New York Department of Finance confirmation of no Cooperative Condominium Abatement **(Exhibit “10”)**;

(i) Florida driver’s license of Rudolph W. Giuliani dated February 22, 2024 **(Exhibit “11”)**;

(j) Vehicle tag for 1980 Mercedes which bore Florida tag JA3414 **(Exhibit “12”)**;

(k) Voter registration in the State of Florida – voter registration number 132378699 dated May 17, 2024 **(Exhibit “13”)**;

(l) Federal Income Tax Return for 2023 Redacted (**Exhibit “14”**);

(m) Calendar noting Defendants’ presence inside and outside the State of Florida in 2024 (**Exhibit “15”**);

(n) Photographs (**Exhibit “16”**);

(o) Bank Statements (**Exhibit “17”**);

Defendant reserves the right to amend this response in the event that Defendant becomes aware of any additional documents responsive to this interrogatory.

INTERROGATORY NO. 4: Identify any financial, medical, or legal professional or firm whom you have consulted during the period of January 1, 2020, through the present.

**AMENDED RESPONSE:** Defendant objects to this interrogatory, as any medical professional, financial professional or legal professional that Defendant consulted with would be information that is not relevant to the claims of Plaintiffs, nor proportional to the needs of the case for the issue in this case which is a narrow issue: (i) whether Defendant was a permanent resident and citizen of the State of Florida pursuant to the Constitution of the State of Florida, (ii) whether condominium unit #5-D located at 315 S. Lake Drive, Palm Beach, Florida (the “Condominium Unit”) was and is and on what date it was the true, fixed, and permanent home and principal establishment of Defendant, and whether such occurred prior to August 5, 2024, and (iii) whether the Condominium Unit was Defendant’s the true, fixed, and permanent home and principal establishment prior to August 5, 2024. Defendant did in fact reside in the State of Florida prior to August 5, 2024 in the Condominium Unit as his true, fixed, and permanent home

and principal establishment, which is the date of relevance for the claims made in this action against Defendant. The further issue in this case is whether Defendant is and was entitled to homestead protection in the State of Florida under the Florida Constitution which is to be determined by Circuit Courts of the State of Florida, and not by a Federal Court in New York. Under the required criteria for claiming a homestead in the State of Florida, Defendant was protected by the homestead laws in the State of Florida prior to August 5, 2024. There is no relevance to this request for the period prior to January 1, 2024, as Defendant listed his cooperative apartment in New York on or about July 19, 2023 when he decided that he would be selling his cooperative apartment in New York and moving to the Florida Condominium Unit as his true, fixed, and permanent home and principal establishment and residence which he did prior to August 5, 2024, as Defendant had maintained a physical presence in his Florida Condominium Unit with the intent to remain there indefinitely.

INTERROGATORY NO. 8: Identify all email accounts, messaging accounts, and phone numbers that You have used during the period January 1, 2023, through the present.

**AMENDED RESPONSE:**

The request is objectionable due to the safety and security concerns of Defendant. Defendant's email address and cell phone telephone number are not relevant to the claims of Plaintiffs in this case and would create danger to Defendant's personal safety and security. Disclosure could lead to threats, harassment, or physical harm of Defendant. Defendant Rudolph Giuliani was a

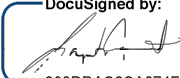
former United States Attorney for the Southern District of New York who had obtained approximately 4,000 convictions as the United States attorney in Manhattan from 1983 to 1989, and Mayor of the City of New York who had received threats to his life. Defendant has been the subject of threats to his life at various points during his career. Defendant was known for his policies on crime reduction and prosecutions of criminal organizations. During the prosecution of Mafia members in New York, and Defendant's crackdown on organized crime, Defendant's life was threatened by organized crime figures. As an attorney who was involved in obtaining the Hunter Biden laptop, where the laptop's authenticity was denied by many in the United States including President Biden. In October 2020, during the final presidential debate, then-candidate President Biden referred to a letter from 51 former intelligence officials suggesting that the Hunter Biden laptop story had all the classic earmarks of a Russian information operation. President Biden characterized the allegations stemming from the laptop as a Russian plant and a bunch of garbage. However in June 2024, during Hunter Biden's trial on federal gun charges, the laptop and its contents were introduced as evidence, with FBI investigators confirming its authenticity. Defendant's involvement regarding the Hunter Biden laptop and investigating Hunter Biden, his associates and attorneys involvement with Burisma Holdings, a Ukrainian natural gas company in Ukraine, such legal work increased Defendant's visibility and attracted hostility and threats from supporters of President Joseph Biden and those who stated that the laptop was Russian disinformation. Additionally, inasmuch as one of Plaintiffs' counsel representing the Plaintiffs' in this case was an attorney who worked with

Hunter Biden at Boies Shiller Flexner and allegedly with Burisma Holdings, and was Associate Counsel to former U.S. President Barack Obama, providing Defendant's email address and cell phone telephone number are not relevant to the issues in this case and the claims of Plaintiffs in this case and would create danger to Defendant's personal safety and security. It would be unsafe for Defendant Rudolph Giuliani to disclose his email address and cell phone telephone number. Protecting unnecessary disclosure of private and personal information is a concern that runs with equal strength through the federal system. *Benacquista v Spratt*, 2017 US Dist LEXIS 226901, at \* (N.D.N.Y. Mar. 7, 2017, No. 1:16-CV-0581 (DNH/DJS)) citing *S.E.C. v. Rajaratnam*, 622 F.3d 159 (2d Cir. 2010).

INTERROGATORY NO. 9: Identify in detail the efforts you undertook to preserve relevant evidence and to collect and produce responsive materials in response to Plaintiffs' Requests for Production.

AMENDED RESPONSE: Defendant did not throw out any documents, Defendant states that he has maintained whatever documents that Defendant had regarding responsive materials in response to Plaintiffs' Requests for Production. Defendant states that he searched through all of his records to obtain responsive materials in response to Plaintiffs' Requests for Production.

Dated: December 7, 2024  
Staten Island, New York

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Plaintiffs,

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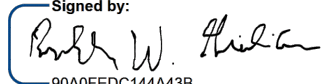
No. 24-cv-6563(LJL)

Defendants' verification of  
Defendant's response to Plaintiffs'  
First Set of Interrogatories

Verification

Rudolph W. Giuliani hereby declares under penalties of perjury that the facts stated in the foregoing Defendant's Amended Responses to Plaintiffs' First Set of Interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: December 7, 2024

Signed by:  
  
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Rudolph W. Giuliani